

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Criminal No. 13-30156-DRH
)	
)	
ROSALYN ROSS,)	
Defendant.)	

STIPULATION OF FACTS

The attorney for the Government and the Defendant stipulate to the following:

1. That **ROSALYN ROSS** defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary must have a written Employment Agreement with the personal assistant and a Service Plan listing all services to be provided in the home of the beneficiary. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.

2. That the Home Services Program is a Medicaid Waiver Program designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division of Rehabilitation Services (DORS) administers the program. Medicaid

Waiver programs enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily be covered under Medicaid.

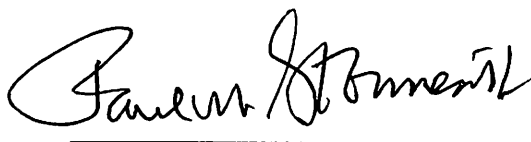
3. That on or about March 15, 2013, in furtherance of a scheme to defraud, **ROSALYN ROSS** completed a Home Services Time Sheet and claimed approximately \$69.30 from the Illinois Medicaid Home Services Program for personal assistant services *that were not performed*. **ROSS** submitted the Home Services Time Sheet stating that **ROSS** performed 1.5 hours of personal assistant services from 6:00AM until 7:30AM on March 1, 2013; 1.5 hours of personal assistant services from 6:00AM until 7:30AM on March 2, 2013; 1.5 hours of personal assistant services from 6:00AM until 7:30AM on March 4, 2013; and 1.5 hours of personal assistant services from 5:00PM until 6:15PM on March 14, 2013. **ROSS** did not perform the personal assistant services on the dates and times as claimed on the Home Services Time Sheet.


4. By this means, **ROSALYN ROSS** knowingly stole United States money used to fund the Illinois Medicaid Home Services Program.

IT IS SO STIPULATED.


ROSALYN ROSS
Defendant

STEPHEN R. WIGGINTON
United States Attorney


PAUL M. STORMENT JR.
Attorney for Defendant


MICHAEL J. QUINLEY
Assistant United States Attorney

Date: 7/3/14

Date: 8-6-2014